

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION**

<b>ZACKARY RILEY,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 2:15-cv-04294-MDH</b>
	)	
<b>HANNIBAL REGIONAL HOSPITAL, et al.</b>	)	
<b>Defendants.</b>	)	

**AFFIDAVIT OF ZACKARY RILEY**

STATE OF OHIO	)	
	)	
COUNTY OF MAHONING	)	ss.

COMES NOW Zackary M. Riley (hereinafter "Affiant"), being of lawful age, being personally acquainted with the following, being competent to testify to the following, and being duly sworn did state upon his oath:

1. Affiant is a resident of Mahoning County, State of Ohio, and is a Permanent resident of the United States.
2. Affiant is the Plaintiff in the United States District Court, Western District of Missouri civil case numbered 2:15-cv-04294-MDH.
3. Affiant has obtained the written opinion of a legally qualified health care provider which states that the defendant health care provider Hannibal Clinic Health Services (originally named in the Complaint as Hannibal Clinic), including its individual health care providers who treated Rosemary Scott (John Does 21 through 40), if they acted and failed to act as alleged in Plaintiff's Complaint, failed to use such care as a reasonably prudent and careful health care provider would have under similar circumstances and that such failure to use such reasonable care directly caused or directly contributed to cause the damages claimed in his Complaint.

4. The legally qualified health care provider who provided the opinion is Dr. Stephen Godfrey, who may be contacted at Path Counsel Pathology Medical Legal Consultation, PO Box 270328, St. Louis, Missouri 63127.

5. Dr. Godfrey is licensed in Missouri and is actively practicing as a pathologist.

6. Dr. Godfrey performed a private autopsy of Rosemary Scott, whose medical treatment is at issue in the Complaint.

8. Affiant says nothing further.

Zachary Riley  
Affiant

In witness whereof I have hereunto subscribed my name and affixed my official seal this \_\_\_\_ day of June, 2016.

Dennis C. Morosky  
Notary Public



DENNIS C. MOROSKY  
Notary Public, State of Ohio  
My Comm. Expires March 16, 2019  
Recorded in Trumbull County